



Orange Southwest School District

24 Central Street, Randolph, VT

802-728-5052

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RECOMMENDED¹

PREVENTION OF CONFLICT OF INTEREST IN PROCUREMENT

Policy

It is the policy of the Orange Southwest School District that all purchasing and contracting comply with state and federal laws. No employee, officer, or agent of OSSD may participate in the selection, award, or administration of a purchase or contract if that person has a real or apparent conflict of interest.

Definitions

1. **Conflict of interest** – a conflict of interest arises if an employee, officer, agent, immediate family member, partner, or an organization which employs or is about to employ any of the parties indicated herein, has a direct or indirect financial or other interest in, or a tangible personal benefit from a vendor considered for a purchase or contract.

Administrative Responsibilities

1. The superintendent or designee shall develop written procurement procedures consistent with state and federal laws and regulations.
2. Any employee, officer, or agent with a real, perceived, or apparent conflict of interest shall notify the superintendent of the conflict and not participate in the selection, award, or administration of the purchase or contract at issue.
3. An employee shall not solicit or accept any favor, gratuity, or anything of monetary value from such vendors which exceeds a \$_____ value.²
4. The SD/SU must take disciplinary action against any employee, officer or agent who violates this policy. Such disciplinary action shall be in accordance with the procedures in the SD/SU personnel manual and/or collective bargaining agreement.³

VSBA Version:	January 12, 2024
<i>Date Warned:</i>	May 13, 2026
<i>Date Adopted:</i>	June 17, 2026
<i>Legal Reference(s):</i>	2 CFR §§200.317 – 327; 2 CFR §200.318 (specifically addresses conflict of interest)

¹ 2 CFR §200.318(a) states that the non-Federal entity “must have and use documented procurement procedures, consistent with State, local, and tribal laws and regulations and the standards of this section, for the acquisition of property or services required under a Federal award or subaward. ”; 2 CFR §200.318 (c)(1) states that non-Federal entities “must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts.” This policy satisfies this requirement.

² 2 CFR §200.318(c)(1) states that “non-Federal entities may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value.”

³ 2 CFR §200.318(c)(1) states “[t]he standards of conduct **must** provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.”